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DECEMBER 30, 2020

Hon. Steven M. Gold

Re: Edward Shin v YS2 Enterprises, Inc. et al.
Case No. 1:17-cv-05183(ILG)(SMG)

Dear Judge Gold:

As the Court is aware, this firm represents Plaintiff, Edward Shin. I write as requested by the Court to report on status of the case and efforts to agree on a date to close fact discovery.

After all other parties were removed from the case, I wrote to counsel for Defendant Lee suggesting a fact discovery end date of March 31, 2021. Counsel for Mr. Lee objected, claiming that I had not supplied medical records in my possession that I had provided to counsel for other defendants, and had not provided medical authorizations. However, this was incorrect. Nonetheless, on December 29, 2020, I re-produced all medical records and re-served medical authorizations that had been served upon counsel for Mr. Lee nearly one year before the date of this letter. Counsel for Mr. Lee has now requested fresh authorizations, which I will provide.

In any event, the fact discovery can easily be completed by March 31, 2021 and Mr. Shin requests that such a fact discovery end date be ordered by the Court.

Respectfully submitted,

/s Robert J. Basil

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